

1 BILL LOCKYER, Attorney General
of the State of California
2 JEANNE C. WERNER
State Bar No. 93170
3 Deputy Attorney General
1515 Clay Street, 21ST Floor
4 P. O. Box 70550
Oakland, CA 94612-0550
5 Telephone: (510) 622-2226
Facsimile: (510) 622-2121
6 Attorneys for Complainant

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**BEFORE THE
CALIFORNIA BOARD OF ACCOUNTANCY
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. AC-2001-34

CLARK WILLIAM ("BILL") GORDIN
1615 H Street
Modesto, CA 95354
CPA Certificate # 22016

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

and

GORDIN ACCOUNTANCY
CORPORATION
1615 H Street
Modesto, CA 95354
COR Registration # 4335,

Respondents.

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
above-entitled proceedings that the following matters are true:

PARTIES

1. Complainant Carol Sigmann is the Executive Officer of the Board of
Accountancy. She brought this action solely in her official capacity and is represented in this
matter by Bill Lockyer, Attorney General of the State of California, by Jeanne C. Werner,
Deputy Attorney General.

2. Respondents C. William ("Bill") Gordin and the Gordin Accountancy
Corporation are represented in this proceeding by attorney Geoffrey A. Goodman, whose firm

1 address is Murphy Austin Adams Schoenfeld, LLP, 1000 G Street, Third Floor, P. O. Box 1319,
2 Sacramento, CA 95812.

3 3. On or about September 26, 1975, the California Board of Accountancy
4 issued CPA Certificate Number 22016 to Respondent Clark William Gordin (known as
5 C. William Gordin or Bill Gordin). Gordin's CPA Certificate was in full force and effect at all
6 times relevant to the charges brought and is renewed through September 30, 2003. On or about
7 August 15, 1996, the California Board of Accountancy issued Corporate Registration Number
8 COR 4335 to Gordin Accountancy Corporation ("Respondent Corporation"). The Corporate
9 Registration was in full force and effect at all times relevant to the charges brought and will
10 expire on August 31, 2002, unless renewed.

11 JURISDICTION

12 4. Accusation No. AC-2001-34 was filed by the Complainant before the
13 Board of Accountancy of the Department of Consumer Affairs ("Board") and is currently
14 pending against Respondents. The Accusation, together with all other statutorily required
15 documents, was duly served on Respondents. A copy of Accusation No. AC-2001-34 is attached
16 as Exhibit A and incorporated herein by reference.

17 ADVISEMENT AND WAIVERS

18 5. Respondent has carefully read and discussed with his counsel the nature of
19 the charges and allegations in the Accusation and the effects of this Stipulated Settlement and
20 Disciplinary Order on both licenses.

21 6. Respondent is fully aware of his legal rights in this matter, including the
22 right to a hearing on the charges and allegations in the Accusation, the right to be represented by
23 counsel, at his own expense, the right to confront and cross-examine the witnesses against him,
24 the right to present evidence and to testify on his own behalf, the right to the issuance of
25 subpoenas to compel the attendance of witnesses and the production of documents, the right to
26 reconsideration and court review of an adverse decision, and all other rights accorded by the
27 California Administrative Procedure Act and other applicable laws.

28 7. Respondent voluntarily, knowingly and intelligently waives and gives up

1 each and every right set forth above.

2 **ADMISSIONS, RESERVATIONS & CONTINGENCIES**

3 8. Respondent understands that the charges and allegations in the
4 Accusation, if proven at a hearing, constitute cause for imposing discipline upon his Certified
5 Public Accountant license and the license of Gordin Accountancy Corporation.

6 9. Respondent agrees that his Certified Public Accountant License and his
7 Corporate License are subject to discipline and he agrees to be bound by the Board's imposition
8 of discipline as set forth in the Order below.

9 10. For purposes of this proceeding only, Respondent admits that, as set forth
10 in paragraph 8 of the Accusation, he was convicted of a crime substantially related to the practice
11 of public accountancy and that, as set forth in paragraphs 9 and 10 of the Accusation, the two
12 audit engagements he performed of the financial statements of Sundial Financial Services, Inc.
13 were grossly negligent.

14 11. The admissions made by Respondent herein are only for the purposes of
15 this proceeding, or any other proceedings in which the Board of Accountancy or other
16 professional licensing agency is involved, and shall not be admissible in any other criminal or
17 civil proceeding.

18 12. This stipulation shall be subject to the approval of the Board. Respondent
19 understands and agrees that Board of Accountancy's staff and counsel for Complainant may
20 communicate directly with the Board regarding this stipulation and settlement, without notice to
21 or participation by Respondent or his counsel. If the Board fails to adopt this stipulation as its
22 Order, except for this paragraph the Stipulated Settlement and Disciplinary Order shall be of no
23 force or effect, it shall be inadmissible in any legal action between the parties, and the Board
24 shall not be disqualified from further action by having considered this matter.

25 13. In consideration of Respondent's stipulation to license revocation, the
26 Board will not seek reimbursement of related and accrued investigation and prosecution costs in
27 this matter at this time. However, should respondent seek reinstatement of his certificate in the
28 future, he agrees that, prior the Board's consideration of his petition for reinstatement, he will

1 reimburse the Board \$19,634.89 for costs incurred in this action.

2 14. The parties agree that facsimile copies of this Stipulated Settlement and
3 Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as
4 the original Stipulated Settlement and Disciplinary Order and signatures.

5 **DISCIPLINARY ORDER**

6 15. In consideration of the foregoing admissions and stipulations, the parties
7 agree that the Board shall, without further notice or formal proceeding, issue and enter the
8 following Disciplinary Order:

9 IT IS HEREBY ORDERED that Certified Public Accountant Certificate Number
10 22016 issued to Respondent Clark William Gordin is revoked and it is further ordered that
11 Accountancy Corporate Registration Number COR 4335 issued to Respondent Gordin
12 Accountancy Corporation is revoked.

13 **ACCEPTANCE**

14 I have carefully read the above Stipulated Settlement and Disciplinary Order and
15 have fully discussed the terms and conditions and other matters contained therein with my
16 attorney Geoffrey A. Goodman, I understand the effect this stipulation will have on my Certified
17 Public Accountant license and my corporate registration. I enter into this Stipulated Settlement
18 voluntarily, knowingly and intelligently and agree to be bound by the Disciplinary Order and
19 Decision of the Board of Accountancy. I further agree that a facsimile copy of this Stipulated
20 Settlement and Disciplinary Order, including facsimile copies of signatures, may be used with
21 the same force and effect as the originals.

22 DATED: _____

see page 4a

23
24 _____
25 C. WILLIAM GORDIN
Respondent (Licenses CPA 22016 and COR 4335)

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1 reimburse the Board \$19,634.89 for costs incurred in this action.

2 14. The parties agree that facsimile copies of this Stipulated Settlement and
3 Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as
4 the original Stipulated Settlement and Disciplinary Order and signatures.

5 **DISCIPLINARY ORDER**

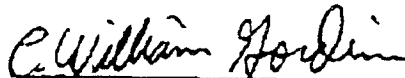
6 15. In consideration of the foregoing admissions and stipulations, the parties
7 agree that the Board shall, without further notice or formal proceeding, issue and enter the
8 following Disciplinary Order:

9 IT IS HEREBY ORDERED that Certified Public Accountant Certificate Number
10 22016 issued to Respondent Clark William Gordin is revoked and it is further ordered that
11 Accountancy Corporate Registration Number COR 4335 issued to Respondent Gordin
12 Accountancy Corporation is revoked.

13 **ACCEPTANCE**

14 I have carefully read the above Stipulated Settlement and Disciplinary Order and
15 have fully discussed the terms and conditions and other matters contained therein with my
16 attorney Geoffrey A. Goodman, I understand the effect this stipulation will have on my Certified
17 Public Accountant license and my corporate registration. I enter into this Stipulated Settlement
18 voluntarily, knowingly and intelligently and agree to be bound by the Disciplinary Order and
19 Decision of the Board of Accountancy. I further agree that a facsimile copy of this Stipulated
20 Settlement and Disciplinary Order, including facsimile copies of signatures, may be used with
21 the same force and effect as the originals.

22 DATED: 1/8/02

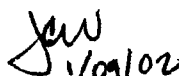
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25 C. WILLIAM GORDIN
Respondent (Licenses CPA 22016 and COR 4335)

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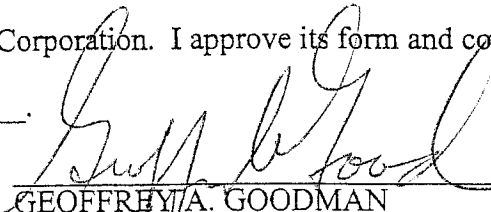
035411103F2001AD0899 C.Wm.Gordin-8tp.

page 4A



1 I have read and fully discussed with Respondent C. William Gordin the terms and
2 conditions and other matters contained in the above Stipulated Settlement and Disciplinary
3 Order and its effect on both his individual CPA license and the accountancy corporate
4 registration of Gordin Accountancy Corporation. I approve its form and content.

5 DATED: 1/8/02

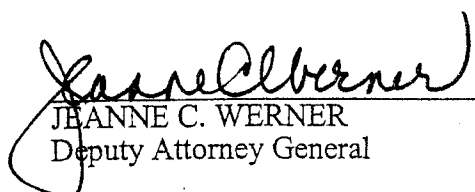

GEOFFREY A. GOODMAN

Murphy Austin Adams Schoenfeld, LLP
1000 G Street, Third Floor
P. O. Box 1319
Sacramento, CA 95812
Attorney for Respondents Bill Gordin
and Gordin Accountancy Corporation

11 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
12 submitted for consideration by the Board of Accountancy of the Department of Consumer
13 Affairs.

14 DATED: 1/9, 20012

BILL LOCKYER, Attorney General
of the State of California


JEANNE C. WERNER
Deputy Attorney General

Attorneys for Complainant

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**BEFORE THE
CALIFORNIA BOARD OF ACCOUNTANCY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

CLARK WILLIAM GORDIN
1615 H Street
Modesto, CA 95354
CPA Certificate # 22016

and

GORDIN ACCOUNTANCY
CORPORATION
1615 H Street
Modesto, CA 95354
COR Registration # 4335,

Respondents.

Case No.AC-2001-34

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Accountancy of the Department of Consumer Affairs, as its Decision in the above entitled matter. This Decision shall become effective on March 1, 2002.

It is so ORDERED on January 30, 2002.



President

For The CALIFORNIA BOARD OF ACCOUNTANCY
CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS

Exhibit A:

Accusation in Case No. AC-2001-34

BILL LOCKYER, Attorney General
of the State of California
CHRISTIANA TIEDEMANN
State Bar No. 105299
JEANNE C. WERNER
State Bar No. 93170
Deputy Attorneys General
1515 Clay Street, 21st Floor
P. O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 622-2226
Facsimile: (510) 622-2121

Attorneys for Complainant

BEFORE THE
CALIFORNIA BOARD OF ACCOUNTANCY
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. AC-2001-34

Clark William Gordin
1615 H Street
Modesto, CA 95354
CPA Certificate # 22016

ACCUSATION

and

Gordin Accountancy Corporation
1615 H Street
Modesto, CA 95354
COR Registration # 4335,

Respondents.

Complainant Carol Sigmann, as causes for disciplinary action, alleges:

PARTIES, JURISDICTION and STATUTES/REGULATIONS

1. Carol Sigmann ("Complainant") brings this Accusation solely in her official capacity as the Executive Officer of the California Board of Accountancy.
2. On or about September 26, 1975, the California Board of Accountancy issued CPA Certificate Number 22016 to Clark William Gordin (aka Bill Gordin; referred to hereinafter as "Respondent Gordin" or "Gordin"). The CPA Certificate was in full force and effect at all times relevant to the charges brought herein and is renewed through September 30, 2003.

1 3. On or about August 15, 1996, the California Board of Accountancy issued
2 Corporate Registration Number COR 4335 to Gordin Accountancy Corporation ("Respondent
3 Corporation"). The Corporate Registration was in full force and effect at all times relevant to the
4 charges brought herein and is renewed through August 31, 2002.

5 4. This Accusation is brought before the California Board of Accountancy
6 ("Board") under the authority of the following sections of the Business and Professions Code.

7 5. Business and Professions Code section 5100 provides in pertinent part
8 that after notice and hearing, the Board may revoke, suspend or refuse to renew any permit or
9 certificate issued by the Board for unprofessional conduct. Unprofessional conduct is defined
10 therein to include but not to be limited to:

11 (a) Conviction of a crime substantially related to the qualifications,
12 functions and duties of a certified public accountant or public accountant.

13 (c) Dishonesty, fraud or gross negligence in the practice of public
14 accountancy or in the performance of specified bookkeeping operations.

15 (f) Willful violation of this chapter or any rule or regulation promulgated
16 by the board under the authority granted under this chapter.

17 6. Section 58 of Title 16, California Code of Regulations (Board Rule 58)
18 provides that licensees of the Board engaged in the practice of public accountancy shall comply
19 with all applicable professional standards, including but not limited to generally accepted
20 accounting principles and generally accepted auditing standards.

21 7. Section 118, subdivision (b), of the Code provides in pertinent part that the
22 expiration of a license does not deprive the Board of jurisdiction to proceed with a disciplinary
23 action during the period within which the license may be renewed, restored, reissued or
24 reinstated. Code section 5070.6 provides that an expired permit may be renewed at any time
25 within five years after its expiration upon compliance with certain requirements.

26 8. Business and Professions Code section 5107 provides for recovery by the
27 Board of all reasonable costs of investigation and prosecution of cases, including but not limited
28 to attorneys' fees, in specified license discipline actions, including actions where violations of

1 Business and Professions Code section 5100, subdivision (a)(when involving felony convictions)
2 and section Business and Professions Code section 5100, subdivision (c), are established. A
3 certified copy of the actual costs, or a good faith estimate of costs signed by the Executive
4 Officer, constitute prima facie evidence of reasonable costs of investigation and prosecution of
5 the case.

6 **FIRST CAUSE FOR DISCIPLINE**

7 (Conviction of a Felony)

8 9. Respondent Gordin is subject to disciplinary action pursuant to Business
9 and Professions Code section 5100, subdivision (a), in that on or about October 5, 2000, he was
10 convicted, pursuant to his guilty plea, in the United States District Court, Eastern District of
11 California, of one felony violation of 18 U.S.C. section 4 (misprision of felony). The factual
12 basis for respondent's guilty plea, as set forth in a document titled "Factual Basis for Plea of
13 Guilty" filed with the plea agreement in the District Court, is as follows:

14 A. At all times relevant, Gordin was a certified public accountant who
15 lived and worked in Modesto, California. He was previously acquainted with codefendants
16 Larry W. Wilcoxson, Roxanne Albaugh and John Witzke. Gordin knew that Wilcoxson was
17 involved in financial and investment activities.

18 B. Beginning no later than approximately November 1998, Gordin
19 agreed to assist defendant Wilcoxson in connection with the banking and later the bookkeeping
20 functions for a high yield investment program marketed by Wilcoxson and others through
21 entities called IFR Trust and JRAM International Enterprises, which entities were controlled by
22 Wilcoxson. Specifically, at Wilcoxson's direction, Gordon agreed to establish a trust account at
23 the Pacific State Bank in Modesto to receive funds from investors and to disburse "profits" to
24 investors. He later opened C. William Gordin Accountancy Corp. trust accounts at the Union
25 Bank of California, and at Wells Fargo Bank, all of which were located in Modesto, and all of
26 which were used to receive and disburse funds on behalf of IFR Trust at Wilcoxson's direction.

27 C. After November 1998, Gordin knew that Wilcoxson, Albaugh,
28 Baxter and others, through IFR Trust and JRAM, were marketing a high yield investment

1 program, in which investor funds were pooled and then supposedly invested in a "trading"
2 program in Europe. He was told by Wilcoxson that the trades yielded profits on the order of
3 50% per "trading cycle." Gordin was told that a "trading cycle" took approximately six weeks,
4 on average, to complete. Gordin knew that Wilcoxson, Albaugh, Baxter and others were
5 marketing the investments to people throughout the United States and abroad through the use of
6 interstate facsimile communications, interstate telephone communications, and the mails, and
7 were using interstate wire transfers to obtain funds from investors in connection with the sales of
8 the investments. Gordin also understood that investors were sent documents as evidence of
9 their investment, including one page "promissory notes" from IFR Trust.

10 D. Money received from the investors was supposed to be invested
11 by Wilcoxson. Wilcoxson was secretive about where and how the money was supposedly
12 invested.

13 E. In early 1999, Wilcoxson asked Gordin to take over preparing
14 account statements for investors. Gordin did so, and thereafter prepared account statements for
15 IFR Trust investors that reflected profits of approximately 50% per "trading cycle" on the IFR
16 Trust investments. Gordin relied on representations directly or indirectly from Wilcoxson that
17 such profits had been earned. Gordin never saw any documents or received any independent
18 information indicating that profits in that amount had actually been generated. Gordin did not
19 know how such profits were purportedly generated.

20 F. In 1999, while Gordin operated bank accounts on behalf of IFR
21 Trust in the name of the C. William Gordin Accountancy Corp. Trust Account at various times at
22 the Pacific State Bank, the Wells Fargo Bank and the Union Bank of California, those accounts
23 received tens of millions of dollars in investor funds and transfers from other Wilcoxson-
24 controlled accounts, and also paid out over \$30 Million to IFR Trust investors and promoters.

25 G. On or about June 29, 1999, Gordin and Wilcoxson attended a
26 meeting at Gordin's office with an informant and an FBI undercover agent. During the initial
27 part of the meeting, Wilcoxson made statements about the nature of the IFR investment program
28 which Gordin knew were untrue. During the meeting, the participants discussed the issue of the

1 IFR Trust promissory notes being securities, and Wilcoxson acknowledged that the IFR Trust
2 promissory notes had never been registered with the U.S. Securities and Exchange Commission.
3 The informant and FBI undercover agent repeatedly questioned the legality of selling these
4 unregistered securities, suggesting that they would get further advice about what needed to be
5 done to legitimize the sales. No later than June 29, 1999, defendant Gordin therefore knew
6 that Wilcoxson and others were willfully using means of interstate communication to sell
7 unregistered securities, a felony under Title 15, United States Code, Sections 77e(a) (1) and 77x.

8 H. Gordin did not know the source of all the funds that came into the
9 bank accounts he controlled on behalf of IFR Trust. During the period that Gordin was handling
10 certain banking functions for IFR Trust, however, more than \$10 million but less than \$20
11 million of the funds which flowed into accounts which Gordin controlled were in the form of
12 checks, cashiers checks, money orders or wire transfers from IFR Trust investors. Gordin knew
13 that these funds represented purchases of IFR Trust securities.

14 I. Between June 29, 1999, and Gordin's indictment, Gordin took no
15 action to report to any judge, law enforcement or other authority under the United States the
16 conduct of Wilcoxson and others who were selling unregistered securities. Moreover, Gordin
17 took affirmative steps to perpetuate and conceal the crime by continuing to accept funds in IFR
18 Trust into the C. William Gordin Accountancy Corp. bank account at Wells Fargo bank, and
19 continuing to make payments from that account. Such conduct lulled the investors and others,
20 preventing disclosure of the illegal conduct.

21 SECOND CAUSE FOR DISCIPLINE

22 (Gross Negligence - Sundial Audit 1/30/98)

23 10. Respondents Gordin and Corporation are subject to disciplinary action
24 pursuant to Business and Professions Code section 5100, subdivision (c), in that they were
25 grossly negligent in their audit of financial statements of Sundial Financial Services, Inc. for the
26 period ending January 30, 1998. Respondents' gross negligence included the following extreme
27 departures from generally accepted accounting principles and generally accepted auditing
28 standards:

1 A. Respondents failed to obtain sufficient competent evidential matter
2 regarding Sundial ownership rights to investments which were being held by a third party in the
3 name of Sundial's principal shareholder, Mr. Wilcoxson. (Violation of AU¹ 326; AU 326.02;
4 AU 326.06; AU 332A.04; AU 339.05.)

5 B. Respondents failed to obtain sufficient competent evidential matter
6 regarding valuation of Sundial's major asset, to wit, bearer bonds issued by the German
7 government in 1926. The values for the bonds contained in the financial statements were from
8 a third party and respondents failed to investigate the qualifications of the third party to
9 determine the value of the bonds. Additionally, respondents' own calculations regarding the
10 value of the bonds differed from that of the third party by \$102,842 per bond and respondents
11 failed to apply additional procedures to determine the correct values for the bonds. (Violation of
12 AU 326; AU 326.02; AU 332A.04; AU 332A.29; AU 336.01; AU 336.08; AU 336.13; AU
13 339.05.)

14 C. Respondents failed to modify their audit report to reflect a departure
15 from generally accepted accounting principles by Sundial based on Sundial's inadequate
16 disclosures in the financial statements. Specifically, respondents' report indicates that Sundial is
17 a development stage company, but the notes to the financial statements do not contain adequate
18 disclosures about the nature of the development activities. (Violation of AU 431.01; FAS² 7,
19 paragraph 12; AU 508.41.)

20 D. Respondents failed to exercise due professional care in performance of
21 the audit as demonstrated by the extreme departures from the professional standards set forth
22 above. (Violation of AU 150; AU 230.02; AU 230.07.)

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24 _____
25 1. Standards applicable to the performance of an audit by generally accepted auditing
26 standards (GAAS) are discussed the Statements on Auditing Standards (SAS) and are codified
by the AICPA. The statements are codified by the "AU" number.

27 2. Standards applicable to financial reporting are referred to as "generally accepted
28 accounting principles" or GAAP. The most authoritative source for GAAP are the Statements
of Financial Accounting Standards, referred to as "SFAS" or "FAS" standards.

1 **THIRD CAUSE FOR DISCIPLINE**

2 (Gross Negligence - Sundial Audit 8/31/98)

3 11. Respondents Gordin and Corporation are subject to disciplinary action
4 pursuant to Business and Professions Code section 5100, subdivision (c), in that they were
5 grossly negligent in their audit of financial statements of Sundial Financial Services, Inc. for the
6 period ending August 31, 1998. Respondents' gross negligence included the following extreme
7 departures from generally accepted accounting principles and generally accepted auditing
8 standards:

9 A. Respondents failed to modify their audit report to reflect a departure
10 from generally accepted accounting principles by Sundial based on Sundial's failure to disclose
11 in notes to the financial statements that a note payable was from a related party. Specifically, the
12 notes to the financial statements failed to disclose that the principal shareholder of Sundial, Mr.
13 Wilcoxson, also controlled the entity to whom the note was payable, Integrated Financial
14 Resources, Inc. (IFR). (Violation of AU 431.01; FAS 57, paragraphs 1, 2 and 24(a); AU
15 508.41.)

16 B. Respondents failed to obtain sufficient competent evidential matter
17 regarding valuation of Sundial's major asset, to wit, bearer bonds issued by the German
18 government in 1926. The values for the bonds contained in the financial statements were from
19 a third party and respondents relied on confirmation from the third party obtained during
20 respondents prior audit of Sundial's financial statements. Respondents failed to perform any
21 investigation of the qualifications of the third party to determine the current value of the bonds.
22 Additionally, respondents' own calculations regarding the value of the bonds differed from that
23 of the third party by \$87,441 per bond and respondents failed to apply additional procedures to
24 determine the correct values for the bonds. (Violation of AU 326; AU 326.02; AU 326.06; AU
25 332A.04; AU 332A.29; AU 336.01; AU 336.08; AU 336.13; AU 339.05.)

26 C. Respondents failed to obtain sufficient competent evidential matter
27 regarding transfer of investments from the principal shareholder, Mr. Wilcoxson, to Sundial.
28 (Violation of AU 326; AU 326.02; AU 326.06; AU 332A.04; AU 339.05.)

1 D. Respondents failed to modify their audit report for a departure from
2 generally accepted accounting principles due to inadequate disclosures in the financial
3 statements. Specifically, respondents' report indicates that Sundial is a development stage
4 company, but the notes to the financial statements do not contain adequate disclosures about the
5 nature of the development activities. (Violation of AU 431.01; FAS 7, paragraph 12; AU
6 508.41.)

7 E. Respondents failed to exercise due professional care in performance of
8 the audit as demonstrated by the extreme departures from the professional standards set forth
9 above. (Violation of AU 150; AU 230.02; AU 230.07.)

10 **FOURTH CAUSE FOR DISCIPLINE**

11 (Gross Negligence)

12 12. Respondents Gordin and Corporation are subject to disciplinary action
13 pursuant to Business and Professions Code section 5100, subdivision (c), in that they were
14 grossly negligent in their performance of bookkeeping services for Wilcoxson and IFR Trust as
15 follows:

16 A. The factual allegations contained in paragraph 9 above are
17 incorporated here by reference.

18 B. Respondent Gordin, through and with respondent corporation, directed
19 staff at respondents' firm to prepare purported investment account statements for investors in
20 IFR Trust. These statements of account, which respondents knew were subsequently provided to
21 investors together with checks written on the C. William Gordin Accountancy Corp. Trust
22 Account, were based solely on directions from Wilcoxson regarding amounts payable and due to
23 investors. During the period that respondents were providing IFR Trust and Wilcoxson with
24 purported investment account statements and checks for investors, neither respondent had
25 sufficient knowledge of the IFR investment program, IFR's operations or IFR's bookkeeping or
26 accounting processes to prepare investment account statements; nor did either respondent
27 question information such as the excessive rate of return (50% every 6 weeks) on investments.
28 Respondents' failure to obtain any knowledge regarding IFR's investment program, its

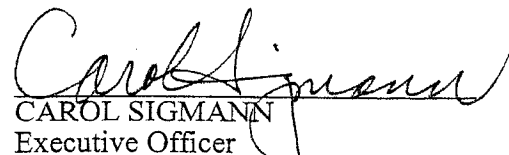
1 operations, and/or its bookkeeping or accounting processes and respondents' failure to question
2 the excessive rate of return, while providing "account statements" and disbursement checks (with
3 the imprimatur of respondent accountancy corporation on the check) constituted extreme
4 departures from the standard of care required by licensees of the Board performing bookkeeping
5 services.

6 **PRAYER**

7 WHEREFORE, Complainant requests that a hearing be held on the matters herein
8 alleged, and that following the hearing, the California Board of Accountancy issue a decision:

- 9 1. Revoking, suspending or otherwise imposing discipline on CPA Certificate
10 Number 22016 issued to Clark William Gordin;
11 2. Revoking, suspending or otherwise imposing discipline on Corporate
12 Registration Number COR 4335 issued to Gordin Accountancy Corporation.
13 3. Ordering Clark William Gordin and Gordin Accountancy Corporation to
14 pay the California Board of Accountancy the reasonable costs of the investigation and
15 enforcement of this case, pursuant to Business and Professions Code section 5107; and
16 4. Taking such other and further action as deemed necessary and proper.

17 DATED: October 19, 2001

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20 CAROL SIGMANN
21 Executive Officer
22 California Board of Accountancy
23 State of California
24 Complainant
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